

# EXHIBIT F

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT,

MELODY J. MILLETT,

On Behalf of Themselves and

All Others Similarly Situated,

Plaintiffs,

vs.

C.A. No. 05-599-SLR

TRUELINK, INC.,

Class Action

a Trans Union Company,

Jury Trial Demanded

Defendant.

VIDEOTAPED DEPOSITION OF STEVEN G.

MILLETT, a Plaintiff, taken on behalf of the  
Defendant before Nissa M. Sharp, CSR, CCR #528,  
pursuant to Notice on the 30th of March, 2007,  
at the offices of THE CLOON LAW FIRM, 11350  
Tomahawk Creek Parkway, Suite 100, Leawood,  
Kansas.

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APPEARANCES

Appearing for the Plaintiffs was

MR. BRYSON R. CLOON of THE CLOON LAW FIRM, 11150  
Overbrook Road, Suite 350, Leawood, Kansas  
66211.

Also appearing for the Plaintiffs was

MR. BARRY R. GRISSOM, 7270 West 98th Terrace,  
Building 7, Suite 220, Overland Park, Kansas  
66212.

Appearing for the Defendant was

MR. MICHAEL O'NEIL of DLA PIPER US, LLP, 203  
North LaSalle Street, Suite 1900, Chicago,  
Illinois 60601-1293.

Also present was Heather Schuman of DLA  
Piper.

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1 Q. And they didn't charge you a fee to  
2 provide that information, did they?

3 A. I don't recall. No, sir.

4 Q. They didn't charge you a fee for the  
5 investigation that they had to do to contact 23  
6 credit grantors, did they?

7 A. I believe that's correct.

8 Q. So, why did you sue Trans Union?

9 A. Because they wrote on the same letter  
10 you're talking about that they had the right to  
11 maintain this information, which was my  
12 information.

13 Q. And so that's why you sued Trans Union?

14 A. Basically, yes.

15 Q. And you're not aware that the lawsuit  
16 against Trans Union has been dismissed; is that  
17 right?

18 A. Well, if you say so, then I'll have to  
19 believe you.

20 Q. Well, I don't want you to believe me, I  
21 just want to establish that you're not aware  
22 that --

23 A. Well, there's things going on right at  
24 this time, you know, that I can't keep up with  
25 all this, you know, I mean, I'm a working guy.

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1 Q. You can't keep up with all what?

2 A. With all the lawyer stuff back and  
3 forth.

4 Q. Because you've filed a number of  
5 lawsuits, haven't you?

6 A. Yes, sir.

7 Q. How many lawsuits have you filed?

8 A. I think five.

9 Q. And are these five separate lawsuits?  
10 Are they all together in one or separate?

11 A. They were all in one and then they got  
12 separated out.

13 Q. So, after the initial lawsuit was filed  
14 against all five companies, your lawyers decided  
15 that that was not a good idea and that they  
16 should file them in separate lawsuits?

17 MR. CLOON: I'm going to object  
18 to the form of the question. Lacks foundation.  
19 Calls for speculation.

20 MR. O'NEIL: I'll --

21 MR. CLOON: Invades the  
22 attorney-client privilege.

23 MR. O'NEIL: I'll withdraw the  
24 question.

25 Q. (BY MR. O'NEIL) Why did you first sue

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1 everybody in one case and then later decide to  
2 sue them in five separate cases?

3 A. That's something the lawyers came up  
4 with.

5 Q. Okay. And who have you sued,  
6 Mr. Millett?

7 A. Ford, Trans Union, Experian, Equifax.  
8 Is that four?

9 Q. That's four, yes. Do you think you've  
10 sued anybody else?

11 A. I guess that's all I can remember.

12 Q. Did you ever sue Bank of America?

13 A. Oh, yeah, that's right.

14 Q. Okay, that's another one.

15 A. Sorry.

16 Q. That's okay, it's hard to keep all this  
17 stuff straight. Did you ever sue a company  
18 called CSC?

19 A. Yeah, I learned that at the last  
20 deposition I think, yeah.

21 Q. So, prior to that last deposition, you  
22 weren't aware that a lawsuit was filed against  
23 CSC in your name?

24 A. Yes, sir.

25 Q. Did that surprise you to find out in a

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1 deposition that in fact you had sued another  
2 company that you weren't aware of?

3 A. Well, like I said before, all this  
4 stuff is -- it's hard for me to keep track of  
5 all of it. My wife handles most of all this.

6 Q. But were you surprised to find out that  
7 you had actually sued a company that you weren't  
8 aware of?

9 A. Well, yeah.

10 Q. Were you surprised to find out that  
11 your lawsuit against Trans Union had been  
12 dismissed?

13 A. Today?

14 Q. Yeah.

15 A. Well, I'm getting kind of confused with  
16 the Trans Union, Truelink. To me it's all the  
17 same company, but, you know.

18 Q. You mentioned a company called  
19 Truelink?

20 A. Yeah. Isn't that what you represent?

21 Q. I thought you said I represented Trans  
22 Union?

23 A. Well, I'm getting confused here.

24 Q. Was your recollection refreshed on the  
25 break that we just took about Truelink?

1 MR. CLOON: I'm going to object  
2 to that question. It's argumentative, invades  
3 the attorney-client privilege.

4 MR. O'NEIL: Are you going to  
5 instruct him not to answer that question?

6 MR. CLOON: No.

7 Q. (BY MR. O'NEIL) Was your recollection  
8 refreshed about the company Truelink during the  
9 break that we just took?

10 THE WITNESS: So go ahead and  
11 answer?

12 MR. CLOON: Yes.

13 A. Yes, sir.

14 Q. (BY MR. O'NEIL) So, you've heard of a  
15 company called Truelink?

16 A. Yes.

17 Q. Okay. And what's your understanding of  
18 what that company is?

19 A. That's who represents the credit  
20 monitoring.

21 Q. Okay. Have you ever sued Truelink?

22 A. That's -- I'm getting confused again.  
23 I mean, is it Trans Union or Truelink?

24 Q. Well, sir, I'm asking you. Because you  
25 identified four companies that you sued and then

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1 I reminded you about Bank of America and CSC.

2 Did you ever sue Truelink?

3 A. I don't recall.

4 Q. Okay. You said that your wife handles  
5 these things for you?

6 A. Yes, sir.

7 Q. Does that mean your wife handles the  
8 litigation?

9 A. My lawyers do that.

10 Q. Maybe I misheard you, Mr. Millett, but  
11 I thought you said that you kind of overwhelmed  
12 by all of the lawsuits that are filed, and your  
13 wife handles that for you. Do you recall saying  
14 that?

15 A. Yeah, my wife works on this.

16 Q. And what does she do for you as part of  
17 the litigation?

18 A. Well, as soon as I found out that we  
19 had -- I had a problem with my identify, I just  
20 turned it all over to her. She pays the bills,  
21 she, you know, she runs the household.

22 Q. And you think filing five or six or  
23 seven lawsuits is part of running the household?

24 A. I'm confused by your question. I  
25 mean....

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1 Q. Well, you said that she runs the  
2 household, right?

3 A. Right.

4 Q. And so do you think filing lawsuits on  
5 your behalf and managing the litigation is part  
6 of running the household?

7 A. Well, she's better at this kind of  
8 stuff than I am.

9 Q. At litigation you mean?

10 A. She's not a lawyer.

11 Q. Well, what is she better at than you  
12 are?

13 A. She's better at remembering things than  
14 I am.

15 Q. Oh. You told us earlier that she's the  
16 one that came to you and said we should buy this  
17 credit monitoring product from Trans Union, do  
18 you recall that?

19 A. Yes.

20 Q. Did she also come to you and say,  
21 Steven, I think we should file all these  
22 lawsuits?

23 A. That was like a -- we came to the  
24 decision together.

25 Q. Kind of like you came to the decision

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1 A. Yes, sir.

2 Q. And did you immediately cancel your  
3 product?

4 A. You have to ask my wife that.

5 Q. Well, I'm asking you, sir. Once you  
6 came to this conclusion that this product  
7 doesn't work and that you want your money back,  
8 did you -- and you don't know if you ever asked  
9 for the money back, but I'm asking you now, did  
10 you ever cancel the product?

11 A. You'll have to ask my wife that.

12 Q. I'm asking you, sir.

13 A. I don't know. I don't know.

14 Q. Isn't it true, Mr. Millett, that to  
15 this day, you're still paying money to Truelink  
16 for the product that you're now claiming doesn't  
17 work?

18 MR. CLOON: Objection.  
19 Argumentative. But you may answer.

20 A. I don't know.

21 Q. (BY MR. O'NEIL) So, as you sit here  
22 today, you don't know if you are still buying  
23 this product; is that right?

24 A. That's right.

25 Q. Did you ever have a conversation with

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1 A. Yes, sir.

2 Q. Okay. And that was a credit monitoring  
3 product?

4 A. Yes, sir.

5 Q. Did you buy anything else at that time  
6 from Truelink?

7 A. Not that I'm aware of.

8 Q. Okay. And that was a product that was  
9 -- that provided you with information over a  
10 period of time, right?

11 A. Right.

12 Q. Okay. And how long a period of time  
13 did that last?

14 A. I don't know. You said it's ongoing,  
15 so we must still have it then.

16 Q. And as part of your -- the credit  
17 monitoring product you bought, e-mails were sent  
18 from Truelink to your home, right?

19 A. Right.

20 Q. And, in fact, they weren't sent to your  
21 e-mail address, but to you're wife's e-mail  
22 address?

23 A. Correct.

24 Q. Okay. Did you ever see any of those  
25 e-mails?

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1 A. I think maybe I saw one. Everything is  
2 honky-dory.

3 Q. Do you know how often your wife  
4 received those e-mails?

5 A. No, I can't answer that, I don't know.

6 Q. Did you ever ask her, ask your wife, if  
7 she ever got more than one e-mail from Truelink?

8 A. No. I don't recall asking her that.

9 Q. Do you know when you purchased the  
10 credit monitoring service from Truelink?

11 A. I can't give you exact date.

12 Q. Can you give me a rough date?

13 A. I think it was like after the police  
14 report or some time around there.

15 Q. Okay.

16 A. In general.

17 Q. Do you know what year that was?

18 A. I think it was 2003, I think.

19 Q. And you told us today that you think  
20 the product that Truelink sold to you doesn't  
21 work, right?

22 A. Yes, sir.

23 Q. And could you tell me in what ways the  
24 product doesn't work?

25 A. Doesn't tell you if somebody's using

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1 Q. So you don't know if you have any  
2 problem with the advertising that's occurred  
3 since that date, right?

4 A. Right.

5 Q. Have you ever had any conversations  
6 with your wife about the advertising?

7 A. Yeah, that they should change it.

8 Q. Okay.

9 MR. O'NEIL: Well, looks like we  
10 need to change the tape, so let's go off the  
11 record.

12 VIDEOGRAPHER: We are now going  
13 off the record at 9:56 AM.

14 (Recess.)

15 VIDEOGRAPHER: It is now 9:58 AM  
16 and we are back on the record. You may  
17 continue.

18 Q. (BY MR. O'NEIL) Mr. Millett, have you  
19 ever heard of something called the Credit Repair  
20 Organizations Act?

21 A. No.

22 Q. Okay. Have you ever heard of something  
23 called a Credit Repair Organization?

24 MR. CLOON: I'm going to object  
25 to this line of questioning. Those claims are

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1 no longer in this lawsuit, so they're totally  
2 irrelevant.

3 Q. (BY MR. O'NEIL) Have you ever heard of  
4 something called a Credit Repair Organization?

5 A. No.

6 MR. CLOON: Same objection.

7 Q. (BY MR. O'NEIL) Are you aware that your  
8 lawyers claim that Truelink violated the Credit  
9 Repair Organizations Act?

10 MR. CLOON: Same objection.  
11 Those claims have been dismissed. They're no  
12 longer in this lawsuit and they're totally  
13 irrelevant.

14 Q. (BY MR. O'NEIL) Are you aware that your  
15 lawyers filed a claim against Truelink alleging  
16 that Truelink has violated the Credit Repair  
17 Organizations Act?

18 MR. CLOON: Same objection.

19 A. No.

20 Q. (BY MR. O'NEIL) To your knowledge, have  
21 you ever been denied credit based upon  
22 information prepared by Truelink?

23 A. I wouldn't know.

24 Q. I'm sorry?

25 A. I don't know.

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1 A. I believe she did.

2 Q. Oh, okay. Did she have any  
3 conversation with you before she began that  
4 investigation?

5 A. I don't recall anything.

6 Q. Okay.

7 A. No.

8 Q. So, if I told you that in fact your  
9 wife did request an investigation, you wouldn't  
10 have any idea what she asked them to  
11 investigate, is that right?

12 A. You'd have to ask her.

13 Q. I will, sir, but I'm asking, you don't  
14 have any idea --

15 A. I don't remember.

16 Q. Okay. You mentioned before that your  
17 wife is better at remembering things than you  
18 are. Do you have a problem with memory just  
19 generally or...

20 A. It's -- yeah, I'd say so, yeah.

21 Q. Okay. Has that made it difficult for  
22 you to give assistance in this litigation?

23 MR. CLOON: I'm going to object  
24 to the form of that question. Calls for  
25 speculation.

1 A. Can you repeat the question?

2 Q. (BY MR. O'NEIL) Has your memory  
3 problems made it more difficult for you to  
4 assist in prosecuting the claims in all of the  
5 lawsuits that you've brought?

6 A. Yeah.

7 MR. CLOON: Same objection.

8 A. I believe so.

9 Q. (BY MR. O'NEIL) Okay. And it's made it  
10 difficult for you to remember things when you  
11 are asked questions in depositions, right?

12 A. Yes, sir.

13 Q. Okay.

14 MR. CLOON: Are we at a breaking  
15 point?

16 MR. O'NEIL: What time is it?

17 MR. CLOON: It's 11:00.

18 MR. O'NEIL: How much time do we  
19 have on the --

20 VIDEOGRAPHER: You have about six  
21 minutes.

22 MR. O'NEIL: Could we just use  
23 the six minutes and we can take a break?

24 MR. CLOON: Sure.

25 Q. (BY MR. O'NEIL) Mr. Millett, I'm going

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1 earlier, Mr. Millett, that when your wife first  
2 purchased the credit monitoring product from  
3 Truelink, that you were kind of -- you looked at  
4 some of the marketing that was on the website at  
5 that time? Or maybe I'm wrong. You know --  
6 strike.

7 A. I think --

8 Q. Go ahead.

9 A. Yeah, I think I said that.

10 Q. Okay. So, she, Mrs. Millett, purchased  
11 the product over the internet, right?

12 A. Correct.

13 Q. And did she do it from her computer at  
14 home?

15 A. Right.

16 Q. And were you sitting there with her in  
17 front of the computer at the time?

18 A. I was sitting behind her.

19 Q. Okay. Why was it that you were sitting  
20 with her while she was buying the product?

21 A. Because I was on my computer.

22 Q. Oh, I see. So you were in the same  
23 room, but you were doing stuff on your own  
24 computer?

25 A. Right..

1 Q. I see. So, you weren't really watching  
2 her go through each step of purchasing the  
3 product, were you?

4 A. No.

5 Q. Okay. Were you even looking at what  
6 she was doing at that time?

7 A. Well, I just kind of glanced over there  
8 and read some stuff, and then I walked back to  
9 my computer.

10 Q. What were you reading?

11 A. The -- what your opening statements  
12 were.

13 Q. You mean the statements on the website?

14 A. Well, telling what about what the  
15 product was, yeah.

16 Q. Okay. And why were you interested in  
17 looking at that?

18 A. Just to see what -- if you had any  
19 disclaimers in there what you did and didn't do.

20 Q. So, when you -- when your wife was  
21 purchasing the product for you, you were  
22 particularly interested in --

23 A. Oh, I was just reading the activity  
24 advertisement just seeing what you had in there.

25 Q. Okay. But you and your wife had

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1 already purchased credit monitoring products  
2 from other companies, right?

3 A. Right.

4 Q. And so you were familiar with what the  
5 product was, right?

6 A. In general.

7 Q. Okay. And when your wife purchased the  
8 products from the other companies prior to  
9 purchasing it from Truelink, were you sitting  
10 looking at the information on the website during  
11 those earlier purchases?

12 A. I don't think so.

13 Q. Okay. What were you doing on the  
14 computer while your wife was purchasing the  
15 product?

16 A. I think I was playing some video game  
17 or something.

18 Q. Is there a reason why your wife was  
19 purchasing the product instead of you?

20 A. Why she was doing it?

21 Q. Right.

22 A. I just -- I think she was looking at it  
23 and she said it was -- it could help us.

24 Q. And do you recall that she provided her  
25 e-mail address instead of yours?

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1 purchasers of credit monitoring by Truelink,  
2 whether or not they were a victim of identity  
3 theft or not; is that right?

4 A. Exactly.

5 Q. Okay. Do you think that if you win  
6 this case and if you're appointed the class  
7 representative, that all members of the class  
8 should get the same money?

9 A. That's hard. I don't know how to  
10 answer that.

11 Q. Why not?

12 A. Well, I don't know what would be fair  
13 to the whole class. I don't know.

14 Q. Because it depends on the particular  
15 harm that each class member suffered, right?

16 A. Well, some of them could have been  
17 paying longer than others, I mean.

18 Q. And some may have actually, in theory  
19 if what you say is true, if your allegations are  
20 all proven true, some people may have suffered  
21 identity theft that they wouldn't have suffered  
22 if Truelink's product was as delivered -- was as  
23 promised; isn't that correct?

24 A. Right.

25 Q. Those people would really have damages,

1 wouldn't they?

2 A. Right.

3 Q. And you want to represent those people,  
4 right?

5 A. I want to represent the class, whoever  
6 signed up for this product.

7 Q. Well, isn't it fair to say that that  
8 kind of customer who suffered identity theft  
9 that really could have been prevented by  
10 Truelink, that they suffered more damages than  
11 somebody who never was a victim of identity  
12 theft?

13 A. I think it would have to be determined  
14 individual case by case.

15 Q. Do you recall answering written  
16 questions that were posed to you and your  
17 lawyers by Truelink in this case?

18 A. Right, my wife helped me with those.

19 Q. Okay, so you do recall it?

20 A. Yeah.

21 Q. Okay. How did your wife help you?

22 A. Well, she, like I said before, she  
23 handled most of this.

24 Q. Did she actually answer the  
25 interrogatories for you?

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1 A. Yes.

2 Q. Okay. And then did she send them to  
3 the lawyers after she wrote the answers?

4 A. Yeah, I think so. Yeah.

5 Q. Did you look at the answers before they  
6 were sent to the lawyers?

7 A. Yeah, I looked them over.

8 Q. Did you make any changes to them?

9 A. No.

10 Q. Did you look them over before they were  
11 sent to the lawyers or just after they were sent  
12 to the lawyers?

13 A. I don't remember.

14 (Millett Exhibit 6 was marked for  
15 identification by the reporter.)

16 Q. (BY MR. O'NEIL) Whose decision was it  
17 to have your wife write the interrogatory  
18 responses rather than you?

19 A. I don't know who -- I don't know who  
20 came up with the idea.

21 Q. Was it you, Mr. Millett?

22 A. Well, she knows more, she was doing  
23 this on my behalf.

24 Q. Was it you that came up with the idea  
25 that your wife should be writing the answers

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1 that were directed to you?

2 A. I don't remember.

3 Q. Did she tell you that this was the  
4 plan? Did she tell you that -- well, strike  
5 that.

6 How did you first learn that there were  
7 questions directed to you in this case?

8 A. Through the interrogatories.

9 Q. Right. Fancy word for questions. How  
10 did you learn that Truelink had asked you to  
11 answer interrogatories?

12 A. I guess through my lawyers.

13 Q. And did you understand that the  
14 questions were directed not at both you and your  
15 wife, and not at your wife, but at you?

16 A. Right.

17 Q. Okay. So, when it was decided by  
18 somebody we don't know that actually your wife  
19 would be writing the interrogatory answers, did  
20 you say, well, wait a minute, I understand that  
21 they're directed at me, so maybe I should be  
22 writing them?

23 A. I don't know how to answer that.

24 Q. Do you want me to have the question  
25 reread for you?

1 A. Well, it's --

2 Q. Did you ask for a copy of it?

3 A. Well, yeah, but I mean, there's e-mails  
4 and I just -- I never --

5 Q. Why couldn't you get a copy of it?

6 A. I just couldn't get a copy of it.

7 Q. Who did you ask?

8 A. I asked -- I asked the -- I asked my  
9 wife if she had a copy.

10 Q. And what did she say?

11 A. She'd have to get an e-mail from Joyce  
12 Yeager.

13 Q. But your wife wasn't able to obtain a  
14 copy of this for you to review in advance of  
15 your deposition?

16 A. No. I -- no.

17 Q. So, when did you see this document  
18 then?

19 A. I think whenever the lawyers handed it  
20 out, I think.

21 Q. Let me direct your attention to the  
22 second page of this exhibit, Mr. Millett.

23 A. Second page.

24 Q. If you see Interrogatory No. 4 there,  
25 sir. And it asks for some specific information

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1 mean? Or is that what you think?

2 A. I think she's disputing all these.

3 Q. Okay. I mean, are you guessing there  
4 or do you know that?

5 MR. CLOON: For the record --

6 A. Yes.

7 MR. CLOON: -- the record the  
8 reference was to the --

9 A. Yes, these are the accounts she was  
10 closing.

11 Q. (BY MR. O'NEIL) Okay. She never  
12 disputed accounts that were on your credit  
13 report, did she?

14 A. Okay, repeat the question.

15 Q. Mrs. Millett never disputed accounts  
16 that were on your credit report, did she?

17 A. I don't -- I don't remember.

18 Q. Okay. You don't recall seeing any  
19 accounts on your credit report that you  
20 disputed, do you?

21 A. That's right.

22 Q. Okay. Your interrogatory answer goes  
23 on to say, quote, "I know that she had to close  
24 accounts which appeared in the letter from Trans  
25 Union," closed quote. Do you see, though, sir?

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1 It's in the middle of that paragraph, quote, "I  
2 know she had to close accounts which appeared in  
3 the letter we got from Trans Union," closed  
4 quote?

5 A. Right.

6 Q. Do you know that she actually closed  
7 accounts?

8 A. I know she was trying to close  
9 accounts. I don't know exactly if they got all  
10 closed or everything. I mean...

11 Q. That's not what your interrogatory  
12 response says though, is it?

13 A. That's right.

14 Q. Goes on to say, quote, "I know it took  
15 her a lot of time to do that and that we spent a  
16 lot of money to do that," closed quote. Do you  
17 see that, sir?

18 A. Yes.

19 Q. You don't really have any knowledge of  
20 that, though, do you?

21 A. I know she was on the phone a lot and I  
22 shelled out \$12,000, so, that's correct.

23 Q. You shelled out \$12,000 to close  
24 accounts?

25 A. No, I shelled \$12,000 to retain

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1 lawyers.

2 Q. To do what?

3 A. To dispute this stuff.

4 Q. So, you hired lawyers to dispute the  
5 accounts that Trans Union identified as relating  
6 to Mr. Perez? Is that why you hired lawyers?

7 A. You're getting me confused, sir.

8 Q. Well, I'm just responding to your  
9 questions. Because this talks about closing  
10 accounts.

11 A. Right, and I said these accounts here.

12 Q. Okay. Fine. So, what I'm asking you  
13 is, did you hire an attorney to help your wife  
14 close the accounts held by Mr. Perez?

15 A. That's not the reason we hired an  
16 attorney.

17 Q. Why did you hire an attorney?

18 A. To help us with this identity theft.

19 Q. The \$12,000, was that paid to  
20 Mr. Adler?

21 A. Two thousand of it was.

22 Q. Who did you pay the other \$10,000 to?

23 A. To Mr. Grissom.

24 THE WITNESS: I was wondering if  
25 I could take a break?

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1 A. I would say it's 50/50.

2 Q. Really? What about Experian, Equifax,  
3 Fair Isaac, CSC, Bank of America, Ford Motor?

4 A. Well, they've got their portions too.  
5 It's all stress related.

6 Q. Well, if it's 50 percent Mr. Perez and  
7 50 percent Truelink --

8 A. Well, I'll take back that answer.

9 Q. Okay. Well, is it fair to say then  
10 that of all these stresses in your life, the  
11 conduct of Mr. Perez has been the greatest  
12 stressor?

13 A. It's all -- it's all proportioned. All  
14 this.

15 Q. I understand, sir. But is it fair to  
16 say that the stress caused by Mr. Perez's acts  
17 is greater than the stress caused by the alleged  
18 failure of the Truelink credit monitoring  
19 product?

20 A. I can't distinguish.

21 Q. Okay. Has the lawsuits created stress  
22 in your life?

23 A. Yes.

24 Q. Yeah. Have you ever suggested to your  
25 wife that you wish you had never gotten involved

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1 in these lawsuits?

2 A. I've told her I haven't been happy with  
3 all this.

4 Q. With the lawsuits?

5 A. With the lawsuits.

6 Q. But you didn't feel like you could tell  
7 her that you'd like to stop the lawsuits, right?

8 A. That's -- that, I don't feel that's an  
9 option.

10 Q. That's why you felt that you couldn't  
11 tell her that, right?

12 A. Well, yeah.

13 Q. A few pages later, Mr. Millett, there's  
14 a page that has Interrogatory No. 14 on it. Do  
15 you see that, sir?

16 A. Yes, sir.

17 Q. And up above, there's an answer to the  
18 prior interrogatory. Do you see that?

19 A. Yes.

20 Q. And your answer is, "I delegated these  
21 matters to my wife who handles the finances for  
22 our family." Right? Do you see that?

23 A. Yes.

24 Q. It goes on to say, "She has a lot more  
25 information about this." Right?

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1 A. Yes.

2 Q. But it was Mrs. Millett who was  
3 providing these interrogatory responses, wasn't  
4 it?

5 A. She was helping me.

6 Q. Oh, she's helping you now? When she  
7 was helping you, did you say, well, rather than  
8 saying that you have a lot more information, why  
9 don't we just give it to them? Did you suggest  
10 that to your wife?

11 A. I don't understand the question.

12 Q. Well, you told us earlier that your  
13 wife wrote the responses. Do you recall that?

14 A. Right.

15 Q. Okay. But now you're kind of stepping  
16 back from that and now you're kind of saying  
17 that she helped you, right?

18 A. You got me all confused.

19 Q. Okay. Who wrote the responses?

20 A. My wife did.

21 Q. Okay. And when you reviewed them, did  
22 you read them? Did you read each response?

23 A. Yes.

24 Q. And when you read this one, my question  
25 is, did you wonder since she's providing the

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1 why you decided to dismiss your claims against  
2 Equifax?

3 A. That's what they came up with.

4 Q. Who's "they"?

5 A. My lawyers.

6 Q. Is this another situation where you  
7 felt like you didn't -- you couldn't disagree?

8 A. I don't -- can -- I'm not understanding  
9 you.

10 Q. Well, earlier I asked you about the  
11 hassles of the litigation and how you really  
12 wished in retrospect that all this litigation  
13 wasn't going on and it was consuming all of your  
14 time and creating all this stress. Do you  
15 recall that conversation?

16 A. Yes.

17 Q. And you said but you felt like you  
18 couldn't change the decision. Do you recall  
19 that, sir?

20 A. Yes.

21 Q. Okay. So, when your lawyers suggested  
22 that you settle with Equifax, was it another  
23 situation where you felt like you couldn't  
24 change the decision?

25 MR. CLOON: I'm going to object.

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# EXHIBIT G

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT, MELODY J. MILLETT, )  
On Behalf Of Themselves and All Others )  
Similarly Situated, )

Plaintiffs, )

v. )

TRUELINK, INC., )  
A Trans Union Company, )

Defendant. )

Case No. 05-599-SLR

**RESPONSE TO PLAINTIFFS' FIRST REQUESTS FOR  
ADMISSION TO DEFENDANT TRUELINK, INC.**

Defendant TrueLink, Inc., now known as Trans Union Interactive, Inc. ("TrueLink"), by its attorneys, hereby responds to Plaintiffs' First Requests for Admission to Defendant TrueLink, Inc. as follows:

**GENERAL OBJECTIONS**

1. TrueLink objects to the definition of "Consumer," as overly broad and unduly burdensome.

2. TrueLink objects to the definition of "Credit Monitoring" as overly broad, unduly burdensome, vague and ambiguous.

3. TrueLink objects to the definition of "Customers," as overly broad, unduly burdensome, and seeks information that is neither relevant to the claims or defenses of any party in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence insofar as the definition includes persons who purchased Credit Monitoring from Trans Union, LLC. TrueLink further objects as it is unclear whether the

term "customer" referenced in certain Requests for Admission is intended to refer to the term "Customer."

4. TrueLink objects to the definition of "Identity Theft" as overly broad, unduly burdensome, vague and ambiguous. TrueLink further objects as it is unclear whether the term "identity theft" referenced in certain Requests for Admission is intended to refer to the term "Identity Theft."

5. TrueLink objects to the definition of "Defendant," "You," and "Your," as overly broad, unduly burdensome and seeks information that is neither relevant to the claims or defenses of any party in this litigation, nor reasonably calculated to lead to the discovery of admissible evidence insofar as the definition includes "any parent corporations and holding companies with which the Defendant is associated . . ."

6. TrueLink objects to each and every Request for Admission to the extent that it calls for information protected from disclosure by the attorney-client privilege or other applicable privilege, and/or is otherwise protected from disclosure on the basis of the attorney work product doctrine.

7. TrueLink incorporates each of these general objections into each Response below.

#### REQUESTS FOR ADMISSION

1. Please admit that Credit Monitoring does not provide complete protection from identity theft.

RESPONSE: TrueLink objects to Request No. 1 as overly broad and unduly burdensome, and because the phrase "complete protection from identity theft" is vague and ambiguous. Subject to and without waiving the foregoing General Objections and

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CERTIFICATE OF SERVICE

I, Heather Schuman, an attorney, depose and state that on this 12th day of July, 2007, I caused a true and accurate copy of the above and foregoing *Response to Plaintiffs' First Requests for Admission to Defendant Truelink, Inc.* to be served upon Attorneys of Record via First Class, U.S. Mail and electronic mail, addressed to said counsel as indicated below:

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